

March 3, 2020

The Honorable Anna G. Eshoo
Chairwoman
Committee on Energy and Commerce
Subcommittee on Health
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Michael C. Burgess
Ranking Member
Committee on Energy and Commerce
Subcommittee on Health
2125 Rayburn House Office Building
Washington, DC 20515

Dear Chairwoman Eshoo and Ranking Member Burgess:

On behalf of the more than 54,000 members of the American Society of Anesthesiologists (ASA), we are writing to provide feedback related to the Committee on Energy and Commerce's March 3 hearing on "Combating an Epidemic: Legislation to Help Patients with Substance Use Disorders." ASA applauds the Committee's bipartisan efforts to advance proposals to address the nation's opioid crisis, especially those aimed at helping individuals suffering from addiction. However, we would like to share some concerns with H.R. 2482, the Mainstreaming Addiction Treatment Act of 2019.

ASA recognizes the leadership role Energy and Commerce has played in passing both the Comprehensive Addiction and Recovery Act in 2016 and the SUPPORT for Patients in Communities Act in 2018, which included provisions important to physician anesthesiologists. Yet, we understand more needs to be done.

Education and Training is Essential to Safe Prescribing of Buprenorphine

The surgical experience can be a patient's first exposure to opioids and for some patients, that exposure can ultimately lead to opioid misuse and abuse. For these reasons, ASA supports policies that encourage responsible prescribing and reduce the number of unused opioids in households—the number one source for diversion. In fact, physician anesthesiologists are implementing opioid-sparing techniques during surgery and utilizing post-operative alternatives to opioids to limit the number of opioids patients need at discharge. ASA is concerned H.R. 2482 will create additional opportunities for diversion of medications and urges the Committee to recognize the importance of education and training to ensure the safe and successful use of buprenorphine.

While buprenorphine can be a safe and effective lifesaving Medication Assisted Treatment (MAT) for those suffering from substance use disorder, this legislation would remove an important safety requirement—the Drug Enforcement Agency's (DEA) Practitioner Waiver. The waiver ensures providers prescribing and dispensing buprenorphine have the appropriate training and education. Buprenorphine is a powerful drug that can have complicated side effects resulting in adverse events; providing it safely to patients requires a deep understanding of the pharmacology associated with this treatment.

Furthermore, buprenorphine is in fact an opioid; it is not a “cure” for opioid use disorder. It is a bridge to definitive therapy provided by addiction therapy physicians. Buprenorphine works at the receptors in the body that respond to endorphins – the same endorphins that cause a “high” for opioid users. While the risk is lower than other opioids, giving buprenorphine to someone who does not use opioids generates the same euphoric response as other opioids. It is therefore subject to misuse and abuse. ASA is concerned that there will be a new pool of buprenorphine prescribers created without the proper training and education.

Retain Provider Education and Training

To minimize risk and ensure patient safety, MAT should be considered and provided as part of a comprehensive care and treatment plan. To that end, ASA believes the existing DEA waiver requirements for administering buprenorphine are essential. This not only ensures that health care practitioners are properly trained, but it also ensures that they have the knowledge to provide the full spectrum of treatments for opioid use disorder. This includes not just MAT, but individual or group therapy, and other evidence-based interventions. However, if the Committee chooses to eliminate the DEA Waiver requirement, we encourage you to retain the provider education and training requirements to prescribe buprenorphine.

Thank you for your leadership in addressing the opioid epidemic in communities across the nation. We appreciate the opportunity to provide input as the committee continues its critically important work on this issue. Please do not hesitate to contact ASA Senior Manager of Congressional and Political Affairs, Ashley Walton, J.D., via email at a.walton@asahq.org or by telephone at (202) 289-2222 if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "MD Peterson, M.D., FASA".

Mary Dale Peterson, M.D., FASA
President
American Society of Anesthesiologists